

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CHRISTINE J. FORGUES)	Case NO. 1:15-cv-1670
)	
Plaintiff,)	
v.)	JUDGE JAMES GWIN
)	
SELECT PORTFOLIO SERVICES, INC.)	MAGISTRATE JUDGE MCHARGH
)	
)	<u>MOTION FOR EXTENSION</u>
Defendant(s))	<u>OF SCHEDULING DEADLINES</u>

Plaintiff, CHRISTINE J. FORGUES, by and through the undersigned counsel, hereby moves this Honorable Court for an eighty (80) day extension of the deadlines contained in the Scheduling Order entered on or about December 1, 2015, and in support thereof would state as follows:

1. Currently, the parties' deadline for filing dispositive motions is due February 29, 2016, with the deadline for Filing Opposition to Dispositive Motions following in quick succession.

2. Good cause exists for the requested extension, Plaintiff recently retained the undersigned to prosecute the instant matter. Undersigned filed his motion to appear pro hac vice on January 15, 2016. This Court entered its Order granting the aforesaid motion on February 3, 2016. As such, the undersigned needs a reasonable amount of time to read, review, and analyze the voluminous documents and pleadings filed in this case in order to properly prosecute and protect the Plaintiff's interests.

3. Formerly Pro Se litigant, Christine J. Forgues, did not know about discovery, depositions, or any of the other avenues available to a litigant. Thus, none was propounded and no testimony has been obtained which could properly support her legal claims.

4. It is imperative that proper discovery be propounded In order to present a proper case with substantial competent evidence to support all claims, allegations and counts brought forth by the formerly Pro Se litigant.

5. The foregoing motion is made in good faith and not for the purpose of delay.

6. There is simply not enough time to prepare and propound requests for production, interrogatories, request for admissions, and take depositions prior to the current deadline.

7. The current scheduling order presents scheduling issues with conflict with the undersigned's current case load. Notwithstanding, the undersigned will work with Defense Counsel in good-faith in order to progress the case expeditiously.

8. Accordingly, the Plaintiff will be severely prejudiced if the relief sought herein is not granted.

9. Neither party will be prejudiced by the relief sought herein.

10. Undersigned counsel has made a good-faith effort to confer with Defense Counsel prior to the filing of this motion, but has been unable to do so.

Notwithstanding, undersigned counsel will make every effort to confer with and resolve this matter with Defense Counsel.

WHEREFORE, Plaintiff, CHRISTINE J. FORGUES, respectfully moves this Honorable Court to GRANT the foregoing motion, and enter an Order continuing the deadlines contained in the Scheduling Order entered on or about December 1, 2015, (DE. 19) for eighty (80) days, in order to allow sufficient time to propound discovery; gather evidence; and mount a proper case to bring before this Honorable Court; and for such other relief as this Court deems just and proper.

Respectfully submitted by,

By: /s/ JOHN HERRERA

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of February, 2016, a copy of the foregoing **MOTION FOR EXTENSION OF SCHEDULING DEADLINES** was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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